UNITED STATES BANKRUPTCY COURT DISTRICT OF MINNESOTA

In re: Chapter 11

IMPORT SPECIALTIES INCORPORATED D/B/A HEARTLAND AMERICA,

Case No. 19-42563

Debtor.

NOTICE OF APPEARANCE AND REQUEST FOR NOTICE

Pursuant to Fed. R. Bankr. P. 9010(b), 2002(g) and 2002(i) and 11 U.S.C. § 1109(b), the undersigned herein provides notice of appearance in the above-captioned case, and requests that a copy of all notices given and all papers (including, but not limited to, pleadings, motions, applications, orders and reports) served or filed in this case, be served upon:

Daniel C. Beck Winthrop & Weinstine, P.A. 225 South Sixth Street, Suite 3500 Minneapolis, Minnesota 55402 Tel: 612-604-6400

Fax: 612-604-6800 dbeck@winthrop.com

Neither this Notice, nor any subsequent appearance (by pleading or otherwise), nor any participation in or in connection with this case is intended to waive (i) the right to have final orders in non-core matters entered only after *de novo* review by a district court judge; (ii) the right to trial by jury in any case, controversy or proceeding; (iii) the right to have the reference withdrawn by the District Court in any matter subject to mandatory or discretionary withdrawal; or (iv) any other rights, claims, actions, defenses, set-offs or recoupments.

Dated: August 23, 2019 WINTHROP & WEINSTINE, P.A.

By: /s/ Daniel C. Beck

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